

ALVERSON, TAYLOR, MORTENSEN & SANDERS
LAWYERS
7401 WEST CHARLESTON BOULEVARD
LAS VEGAS, NEVADA 89117-1401
(702) 384-7000

ALVERSON, TAYLOR, MORTENSEN & SANDERS
KURT BONDS, ESQ. (#006228)
7401 W. Charleston Boulevard
Las Vegas, Nevada 89117
(702) 384-7000
efile@alversontaylor.com
Attorneys for Defendant / Cross-Claimant
SOUTHERN HIGHLANDS
COMMUNITY ASSOCIATION

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

*

WELLS FARGO BANK, N.A., a national
banking association,

Plaintiff,

vs.

SFR INVESTMENTS POOL 1, LLC, a Nevada
limited-liability company; SOUTHERN
HIGHLANDS COMMUNITY ASSOCIATION,
a Nevada non-profit corporation; TERRAZA
HOMEOWNERS ASSOCIATION, a Nevada
non-profit corporation; and ALESSI & KOENIG,
LLC, a Nevada limited-liability company,

Defendant.

SFR INVESTMENTS POOL 1, LLC, a Nevada
limited liability company,

Counter-Claimant,

vs.

WELLS FARGO BANK, N.A., a national
banking association

Counter-Defendant.

Case No. 2:15-cv-00813-RFB-CWH

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DISPOSITIVE MOTIONS AND
PRETRIAL ORDER**

(FIRST REQUEST)

SOUTHERN HIGHLANDS COMMUNITY
ASSOCIATION, a Nevada non-profit corporation,

Cross-Claimant,

vs.

ALESSI & KOENIG, LLC, a Nevada limited-liability
company.

Cross-Defendant.

**STIPULATION AND ORDER TO EXTEND DEADLINE FOR DISPOSITIVE MOTIONS
AND PRETRIAL ORDER (FIRST REQUEST)**

COMES NOW Defendant/ Cross-Claimant Southern Highlands Community Association,
by and through Kurt Bonds, Esq. of the Law Firm of ALVERSON, TAYLOR, MORTENSEN &
SANDERS, and Plaintiff / Counter-Defendant WELLS FARGO BANK, N.A., by and through
the Law Firm of SNELL & WILMER L.L.P., and Defendant/Counter-Claimant SFR
INVESTMENTS POOL 1, LLC, by and through Diana Cline, Esq. of the Law Firm of KIM
GILBERT EBRON, and Defendant/ Cross-Defendant ALESSI & KOENIG, LLC, by and
through Steven T. Loizzi, Esq. of the Law Firm of ALESSI & KOENIG, LLC, hereby submit
this Stipulation to extend the deadline to file dispositive motions to August 1, 2016. Further, the
parties stipulate to extend the deadline to file the pretrial order, if no dispositive motions are
filed, to October 17, 2016.

The parties represent the following:

1. The deposition of Wells Fargo's 30(b)(6) witness was originally scheduled for
June 17, 2016. As a result of the illness of the witness, the deposition was rescheduled to July
15, 2016.
2. Wells Fargo's 30(b)(6) witness is part of a delayed jury trial in Los Angeles and is
on call anytime from July 13, 2016 to July 15, 2016.

ALVERSON, TAYLOR, MORTENSEN & SANDERS
LAWYERS
7401 WEST CHARLESTON BOULEVARD
LAS VEGAS, NEVADA 89117-1401
(702) 384-7000

ALVERSON, TAYLOR, MORTENSEN & SANDERS
LAWYERS
7401 WEST CHARLESTON BOULEVARD
LAS VEGAS, NEVADA 89117-1401
(702) 384-7000

1 3. The parties agree that the deposition of Wells Fargo's 30(b)(6) witness will now
2 take place on July 19, 2016.

3 4. To allow the parties to use Wells Fargo's 30(b)(6) witness deposition testimony to
4 support dispositive motions, the parties further agree that the dispositive motions deadline of July
5 18, 2016 should be extended to August 1, 2016.

6 5. The parties further agree that the pretrial order deadline of August 17, 2016
7 should be extended to October 17, 2016 or until 30 days after the Court rules on any dispositive
8 motions, per LR 26-1(b)(5).

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

This is the parties' first request for an extension on these deadlines, and this request is not intended to cause any delay or prejudice to any party. Instead, this stipulation is submitted in good faith to allow the parties to potentially submit dispositive motions with all available information.

DATED this 12th day of July, 2016

DATED this 12th day of July, 2016

ALVERSON, TAYLOR, MORTENSEN
& SANDERS

SNELL & WILMER L.L.P.

By /s/ Kurt Bonds
KURT BONDS, ESQ. (#006228)
7401 W. Charleston Boulevard
Las Vegas, Nevada 89117
Attorneys for Defendant
SOUTHERN HIGHLANDS
COMMUNITY ASSOCIATION

By /s/ Wayne Klomp*
AMY F. SORENSON, ESQ. (#012495)
ANDREW M. JACOBS, ESQ. (#012787)
WAYNE KLOMP, ESQ. (#010109)
50 West Liberty Street, Suite 510
Reno, NV 89501-1961
Attorneys for Plaintiff / Counter-Defendant
WELLS FARGO BANK, N.A.

**Electronic signatures entered with permission*

DATED this 12th day of July, 2016

DATED this 12th day of July, 2016

KIM GILBERT EBRON

ALESSI & KOENIG, LLC

By /s/ Diana Ebron*
DIANA CLINE EBRON, ESQ. (#010580)
JACQUELINE A. GILBERT, ESQ. (#010593)
KAREN L. HANKS, ESQ. (#09578)
7625 Dean Martin Drive, Suite 110
Las Vegas, NV 89139
Attorneys for SFR Investments Pool 1, LLC

By /s/ Steven Liozzi*
STEVEN T. LIOZZI, ESQ. (#010920)
9500 West Flamingo Road, Suite 205
Las Vegas, Nevada 89147-5721
Attorney for Defendant / Cross-Defendant
Alessi & Koenig, LLC

ALVERSON, TAYLOR, MORTENSEN & SANDERS

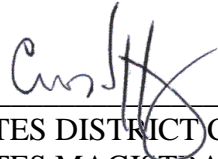
LAWYERS
7401 WEST CHARLESTON BOULEVARD
LAS VEGAS, NEVADA 89117-1401
(702) 384-7000

ORDER

IT IS SO ORDERED. The deadline for the Parties to file dispositive motions is hereby moved from July 18, 2016 to August 1, 2016.

IT IS FURTHER ORDERED. The pretrial order deadline is hereby moved from August 17, 2016 to October 17, 2016 or until 30 days after the Court rules on any dispositive motions, per LR 26-1(b)(5).

DATED July 14, 2016



UNITED STATES DISTRICT COURT JUDGE/
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by

ALVERSON, TAYLOR, MORTENSEN
& SANDERS

By /s/ Kurt Bonds
KURT BONDS, ESQ. (#006228)
7401 W. Charleston Boulevard
Las Vegas, Nevada 89117
Attorneys for Defendant
Southern Highlands Community Association

ALVERSON, TAYLOR, MORTENSEN & SANDERS

LAWYERS
7401 WEST CHARLESTON BOULEVARD
LAS VEGAS, NEVADA 89117-1401
(702) 384-7000